

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA )

v. )

MOHAMED ALKHOLANI )

Criminal No. 04MJ632-KPN

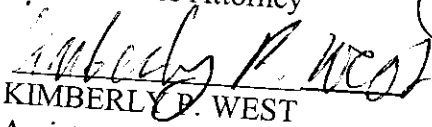
GOVERNMENT'S MOTION TO SEAL  
COMPLAINT AND AFFIDAVIT

The United States of America hereby moves this Court to direct that the complaint and affidavit be sealed until the defendant's arrest in the above-captioned case. The government also hereby moves this Court to direct that the complaint and affidavit be unsealed upon the defendant's arrest. As grounds for this motion, the government states that public disclosure of the complaint and affidavit prior to the defendant's arrest could jeopardize the investigation of this matter and the safety of law enforcement officers. The government submits that sealing the complaint and affidavit until the defendant's arrest and unsealing it thereafter will serve the interests of justice.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By:

  
KIMBERLY P. WEST  
Assistant U.S. Attorneys

Date: March 30, 2004